

2733 Woodstock Road
Los Angeles, CA 90046-1118

June 14, 2016

Via USPS and email

Ms. Linda Lou, Community Planner
City of Los Angeles Department of City Planning
200 N. Spring Street, Room 67 mail stop 395
Los Angeles, CA 90012

linda.lou@lacity.org

Re: Hollywood Community Plan Update

Dear Ms. Lou:

Thank for the opportunity to provide written comments to the Planning Department of the City of Los Angeles with regard to the proposed Hollywood Community Plan Update project (Proposed Plan) in advance of the Department's coordinating the preparation of a Draft Environmental Impact Report (DEIR) for the Proposed Plan.

I am writing to you as an individual even though I am the first vice president of the Hollywood Hills West Neighborhood Council (HHWNC), which is one of Los Angeles' certified neighborhood councils. As HHWNC's vice president, I also chair HHWNC's Planning and Land Use Management Committee (PLUM). HHWNC is likely to make comments to you regarding the DEIR, but I wanted to take this opportunity, as an individual, to provide written comments prior to the preparation of the DEIR.

HHWNC's footprint includes an extensive part of the Hollywood Community Plan's area. HHWNC's area is bounded by Laurel Canyon on the west, Mulholland Drive, the Cahuenga Pass and the Los Angeles River on the north, Mt. Tom, part of Lake Hollywood and Cahuenga Blvd. on the east, and Hollywood Blvd., La Brea and Fountain on the south.

As you probably will remember, during the presentation portion of the scoping meeting which the Planning Department held on Tuesday, May 17, 2016, you and your team presenting the Proposed Plan mentioned three or four notable changes in the Proposed Plan. One of those highlighted changes was to increase the density in the Franklin Corridor area and to add similar zoning to additional lots where Yamashiro and related businesses were located. Anastasia Mann, HHWNC's president, and I were surprised.

This highlighted change was astonishing as well as alarming because, when the Hollywood Community Plan Update Draft Environmental Impact report was circulated for comments in 2011, HHWNC and City Council District 4 staff worked together on this topic. We, collectively, thought that the Planning Department had agreed to provide in the final environmental impact

report (2012 Final EIR) that (i) no new apartments built in the Franklin Corridor would be less than 400 square feet, and (ii) that the average size of apartments in new buildings in the Franklin corridor would be at least 600 square feet. Our understanding back in November, 2011, was that the Planning Department staff had agreed to not up zone the Franklin corridor; I even showed you an email referring to our understanding.

Immediately following the presentation portion of the scoping meeting, you, Bryan Eck, Julia Duncan, CD4's planning deputy, Catherine Landers, CD4's senior field deputy, Anastasia Mann and I talked about this. You and Bryan followed up nicely with me, and you showed us that the Planning Department 2012 Final EIR only provided that new apartments built in historic buildings would need to be at least 400 square feet unless an exception were granted by an office maintaining a registry of historical buildings. Thank you for listening to our comments, and also for following up in a very timely manner.

Since the 2012 Final EIR did not reflect the less intense zoning which then (and now recently retired) Chief Planning Deputy Renee Weitzer, as well as HHWNC, thought that Planning Department staffers Kevin Keller and Mary Richardson had agreed to include, I think it's appropriate to do so now in the Proposed Plan. The significant environmental problems and unmitigated impacts in this area continue now in 2016, and we know even more about these impacts. The Proposed Plan should be revised to provide what we thought had been included in the 2012 Final EIR.

As I pointed out in my letter to Ms. Srimal Hewawitharana, which is dated June 1, 2011, the Franklin corridor area is an area where density should not be increased.

Specifically, on page 3, I observed that:

"the increased density being proposed by downsizing the required minimum residential unit size for the Franklin corridor running generally from La Brea through and beyond the 101 to the east is going to induce growth, rather than accommodate growth. Increasing zoning to allow more small residential units means more growth and more density. The impact of inducing that growth is either minimized or ignored in the DEIR.

Substantial portions of these two corridors {Barham and Franklin} already are too densely populated and suffer from traffic gridlock, insufficient parking and insufficient infrastructure. Instead of increasing the density in these corridors, the zoning and density in these corridors should be kept at their current levels unless and until traffic improvements/mitigations are required and implemented, including additional parking for residents and visitors.

Barham/Cahuenga, the 101 and Highland, Franklin/Hollywood/Sunset and Fountain often can be simultaneously gridlocked by an accident or special event. These streets form an almost inverted "T" shaped traffic corridor through the Cahuenga Pass and downtown Hollywood. Their traffic problems are interrelated. In order to support additional density and development in these areas, there needs to be mandated improvements today. Statements suggesting that we share or have aspirations for improving traffic and mobility by 2030 are little more than "wishful thinking."

The 2012 Hollywood Community Plan provided for a long range traffic study in Policy sections M 1.87.1 and M 1.87.2. No long range traffic study was started as far as I know, and there have

been no real traffic improvements. Arguably, the traffic in the Franklin corridor is worse in 2016. It's often bumper to bumper, and not just at peak weekday traffic times. Special events, such as movie premieres and The Oscars, trigger lane and road closures on Hollywood Blvd which impel drivers to use Franklin as a logical alternate east-west route. As a result, gridlock is frequent on Franklin.

Just as in 2012, now in 2016, there is no basis for increasing density in the Franklin corridor. To be clear, I am including the Yamashiro related lots when I refer to the Franklin corridor.

We know that this area draws people from all over Los Angeles and the world to visit Runyon Canyon Park. 1.8 million people visit the park annually. There is no parking for these people and their vehicles. Only a small portion of these 1.8 million annual visitors take mass transit to get to the park. In the park, there are not even any bathroom facilities. Fresh drinking water fountains haven't operated well in Runyon Canyon Park for more than a decade. The infrastructure in the area can't support increased density.

The Proposed Plan provides an opportunity to correct our mistaken assumptions and get it right this time. We should do so. I am suggesting that the Planning Department do so in the DEIR. In this way, everyone would be able to see that the Planning Department is not going to recommend increasing density in the Franklin corridor at the next stage of updating the Hollywood Community Plan. The corridor can't handle additional density, additional traffic, or even much additional high-rise building (because the Hollywood earthquake fault runs right through the corridor).

Specifically, the draft Hollywood Land Use and Zone Change Matrix dated May 13, 2016, provides zoning changes for this area at Item nos. 3.1A, 3.1D, 3.2B and 3.3.

Item 3.1A provides for maintaining the north and south sides of Franklin between Highland and La Brea as High Medium Residential zoned areas. Floor to area ratios could be 3 to 1, and the height limit would be 45 feet. The matrix includes a note that the goal is to increase housing capacity there, which seems inappropriate for this area. Revisions and downsizing seem appropriate.

Would there be any possible bonuses available to developers there? On menu or off menu? If so, then the zoning should be down graded so that any such bonuses do not provide for more intense development there.

Item 3.1D provides for the Yamashiro lots to receive a high medium residential zoning, but limits height to 30 feet to provide transition between hotel uses and single family residential uses.

Again, would there be any bonuses available to developers there? On menu or off menu? If so, then the zoning should be down graded so that any such bonuses do not provide for more intense development there. Revisions and downsizing seem appropriate.

Item 3.2B provides for a change from high residential to high medium residential zoning for the area south of Franklin and north of Yucca roughly between La Palmas to Cherokee. The matrix includes a note about increasing housing capacity on those lots.

Were you aware that the Hollywood Earthquake Fault runs through this area, and might well make your desire to increase the zoning problematic? And, that state law might make constructing new high rise buildings there illegal?

HHWNC had one developer come to an HHWNC board meeting to discuss his abandoning his plans to build a hotel on a lot at Highland/Franklin. The site is now being turned into additional parking.

Similarly, HHWNC's board heard a presentation last year from a parking lot operator about his plans to operate a parking lot on the south side of Franklin east of Highland, which had been slated for apartments.

Given the earthquake risk and what HHWNC has seen, is this proposed zoning change appropriate? Or, even legal given that state laws prohibit building above certain earthquake fault lines? I didn't see any departmental analysis in the Proposed Plan about earthquake faults; did I miss something? The seismic issues involved in any buildings to be constructed in the Franklin corridor need to be considered, analyzed and discussed as part of the process of updating the Hollywood Community Plan.

Finally, Item 3.3 provides for high residential zoning, a floor to area ratio of 6 to 1, and a height limit of 60 feet. Would developers be eligible under state or city law for bonuses, whether on menu or off menu, to increase the density?

It seems that the matrix items mentioned in this letter should be revised to lessen development in the Franklin corridor. And the Proposed Plan and DEIR should provide explicitly for (i) a 400 square foot minimum size for new apartments, and (ii) an average of 600 square foot apartments in new apartment buildings in the Franklin corridor area.

The Proposed Plan provides an ideal opportunity to improve our zoning and correct the problem(s) we thought had been corrected in the 2012 Final EIR. In order to comply with California CEQA's requirements, it seems that these changes should be made now as the as the Planning Department coordinates the preparation of the DEIR.

Sincerely,

Orrin Feldman, Esq.

cc: Hon. David Ryu, Los Angeles City Council Member
Ms. Sarah Dusseault, Chief of Staff
Ms. Julia Duncan, Planning Deputy
Ms. Anastasia Mann, HHWNC President
Mr. Kevin Keller, Office of the Mayor
Ms. Mary Richardson, City Planner
Mrs. Renee Weitzer, retired Chief Planning Deputy